

MEMO ENDORS

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May 9, 2022

VIA ECF

The Hon. Valerie E. Caproni United States District Judge **United States District Court** Southern District of New York 40 Foley Square, Room 240 New York, NY 11201

Re: Quentin Carter v. American Security Programs Inc.

No. 22-cv-02043 (VEC)

Dear Judge Caproni:

We represent Defendant American Security Programs Inc. ("Defendant") in the above referenced matter. We write to respectfully request an extension of time from May 13, 2022¹, until May 31, 2022, to answer Plaintiff's Complaint. Plaintiff's Counsel consents to this request and this is Defendant's first request for an extension of time to respond to the Complaint.

The reason for this request is that we are still gathering and analyzing relevant documents and information in connection with this matter, and I will be on vacation the week of May 8. The additional time will allow us an opportunity to review the additional documents and information and submit an appropriate response to the allegations in the Complaint.

Thank you for the Court's time and consideration of this request.

Respectfully submitted,

/s/ Daniel Gomez-Sanchez

Daniel Gomez-Sanchez Kimberly Wilkens

¹ The Defendant respectfully notes that the information provided in ECF Docket No. 6, stating Defendant's answer date is May 23, 2022, is incorrect.

cc: All attorneys of record (via ECF)

4875-1842-7678.1 / 068090-1165

Application GRANTED.

SO ORDERED.

Date: May 9, 2022

HON. VALERIE CAPRONI

UNITED STATES DISTRICT JUDGE